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UNITED	STATES	DIST	RICT	COI	JRТ
SOUTHE	ERN DIST	ΓRICT	OF N	EW	YORK

JAMES CONNOLLY, individually and on behalf of : all others similarly situated,

08-CV-5072 (RJS)

Plaintiff,

v

AMERICAN INTERNATIONAL GROUP, INC., MARTIN J. SULLIVAN, STEVEN J. BENSINGER, JOSEPH J. CASSANO, ROBERT E. LEWIS and DAVID L. HERZOG.

Defendants.

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DATE FILED: 12

STIPULATION AND [PPOPESED] ORDER

IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by and among the undersigned counsel to the parties in the above-captioned action, as follows:

Defendants' time to answer, move, or otherwise respond to the complaint filed in the above-captioned action is extended until after the Court appoints lead plaintiff and lead counsel for the putative Class, and lead plaintiff serves a consolidated amended complaint or designates a pending complaint as the operative complaint.

After the Court has appointed lead plaintiff and lead counsel for the putative Class, counsel for Defendants will confer with lead counsel to establish a schedule with respect to filing a consolidated amended complaint and any responsive pleadings.

Dated: New York, New York June 30, 2008

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Hon. Richard J. Sullivan, U.S.D.J.